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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 BRIELLE MEAGHER, individually, and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 vs.

16 TELUS INTERNATIONAL (U.S.) CORP.,

17 Defendant.

Case No.: 2:20-cv-02074-RFB-DJA

18 **STIPULATION AND ORDER FOR AN
EXTENSION TO STAY ALL
PROCEEDINGS PENDING SETTLEMENT
DISCUSSIONS**

19 **(SECOND REQUEST)**

20 Pursuant to LR IA 6-1, LR IA 6-2 and LR 7-1, Plaintiff Brielle Meagher (“Plaintiff”) and
21 Defendant TELUS International (U.S.) Corp (“Defendant”), by and through their respective
22 counsel of record, hereby stipulate and agree to stay all proceedings in this action for seventy-eight
23 (78) days up to and including June 15, 2021 to allow the parties to attend mediation in this matter.
24 The parties have scheduled mediation for June 8, 2021. This is the parties’ second request for an
25 extension of time. The first request for an extension of time was filed on January 26, 2021 (ECF
26 No. 21) and granted on February 11, 2021 (ECF No. 23).

27 The purpose of the Stay is to promote judicial economy and allow this court to more
28 effectively control the disposition of the cases on its docket with economy of time and effort for

1 itself, for counsel, and the litigants. *See Landis v. N. Am. Co.*, 299 U.S. 248, 254 (U.S. 1936) (“the
 2 power to stay proceedings is incidental to the power inherent in every court to control the
 3 disposition of the causes on its docket with economy of time and effort for itself, for counsel, and
 4 for litigants”); *Pate v. DePay Orthopedics, Inc.* 2012 WL 3532780, at * 2 (D. Nev. Aug. 14, 2012)
 5 (“A trial court may, with propriety, find it is efficient for its own docket and the fairest course for
 6 the parties to enter a stay of an action before it, pending resolution of independent proceedings
 7 which bear upon the case”), citing *Leyva v. Certified Grocers of Cal., Ltd.* 593 F.2d 857, 863 (9th
 8 Cir. 1979).

9 Pending the outcome of the parties’ mediation, the parties will provide a Status Report to
 10 the Court no later than June 15, 2021 setting forth the following dates:

11 1) Should the parties resolve this matter at mediation, the parties will set forth a
 12 briefing schedule for joint settlement approval.

13 2) Should the parties be unsuccessful, Defendant will have up to and including July 6,
 14 2021 to file its response to Plaintiff’s Class Action Complaint.

15 Should the parties need additional time in excess of the stay for reasons related to
 16 rescheduling of the mediator, they reserve the right to request additional time from the Court.

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This Stipulation is made in good faith and is not intended for purposes of delay.

DATED this 24th day of March, 2021.

DATED this 24th day of March, 2021.

BROWN, LLC

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C.

/s/ Nicholas R. Conlon

/s/ Dana B. Salmonson

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ORDER

IT IS SO ORDERED.


RICHARD E. BOULWARE, II
United States District Court

DATED this 24th day of March, 2021.